



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

FIELD OPERATIONS - WASTE MANAGEMENT  
Suite 6010, Lee Park  
555 North Lane  
Conshohocken, PA 19428  
215 832-6212

December 1, 1992

CMS Gilbreth Packaging Systems  
c/o James Jordan  
3001 State Road  
Croyden, PA 19020

Re: Hazardous Waste Inspection  
Inspection Date: 11/9/92  
Bristol Township  
Bucks County

NOTICE OF VIOLATION

Dear Mr. Jordan:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for hazardous waste facilities are contained in Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations found during our inspection are as follows:

262.42(a): A generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter or within 7 days of the date of estimated arrival at the hazardous waste facility, whichever is less, shall contact the transporter or the owner or operator or authorized representative of the designated hazardous waste management facility, or both, to determine the status of the hazardous waste shipment and then notify the Department within 24 hours, by telephone, of the status of the shipment.

During the Department's November 9, 1992 inspection of your facility, returned, signed copies of the following manifests could not be located:

"Remtech" Manifests No.: PAC5886506 10/9/92, No return copy  
PAC5885121 7/24/92, No return copy

"Safety-Kleen" Manifests No.: PAC7028803 7/20/92, No return copy  
PAC6632452 5/28/92, No return copy

262.34(a)(4): A generator may accumulate hazardous waste onsite without a permit for 90 days or less if on each container, each date on which any hazardous waste was placed in that container shall be clearly marked and visible for inspection.

CMS Gilbreth Packaging Systems  
December 1, 1992

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One 55 gallon steel drum full of waste ink labeled F003/F005/D001 hazardous waste did not have an accumulation date on it. This drum was being stored in the outside drum accumulation area.

One 55 gallon steel drum two-thirds full of F006 filter cake was being stored on the outside of the caged indoor "Permit by Rule" waste treatment area. This container was not labeled or dated.

265.173(a): A container holding hazardous waste shall be kept closed during storage, except when it is necessary to add or remove waste.

The 55 gallon drum two-thirds full of F006 filter cake did not have a lid.

262.34(a)(1): A generator may accumulate hazardous waste onsite without a permit for 90 days or less if the waste is shipped offsite or treated or disposed of onsite within 90 days or less.

One 55 gallon blue plastic drum marked "chromic acid/copper sulfate D002, 6, 7, 8" stored inside the facility just outside of the Permit By Rule area had a April 20, 1992 accumulation date marked on it.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations. The Department's inspection report contains time periods of completion of remedial actions. These reports are either enclosed or have been previously supplied to you. If your proposed abatement program indicates certain corrections cannot be completed within these time periods, you are requested to supply justification for any extensions.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Resources.

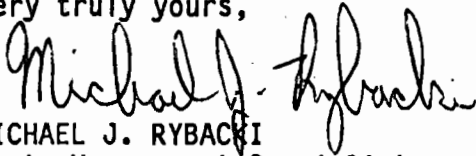
CMS Gilbreth Packaging Systems

December 1, 1992

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If you have any questions concerning this matter, please feel free to contact me at 215 832-6190.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Michael J. Rybacki". The signature is fluid and cursive, with the first name "Michael" being the most prominent.

MICHAEL J. RYBACKI  
Waste Management Specialist

cc: US EPA/RCRA Enforcement  
Division of Compliance & Monitoring  
Compliance  
Mr. Dinda  
Re 30 (SH)330.3

Lumsized

Hazardous Waste Inspection Report - BSWM  
Generators - Part A

Date of inspection 11/9/92 Time start 11:00 Time finish 2:00  
Name of inspector Mike Rybacki  
Company, installation name CMS Gilbreth Packaging Systems  
Location 3001 State Rd. Croyden, PA 19020  
County Bucks Municipality Bristol Twp.  
Identification number PAD981103617  
Name of responsible official James Jordan  
Title \_\_\_\_\_  
Mailing address 3001 State Rd. (see above)  
Area code and telephone number 215-785-3350  
Name of person interviewed James Jordan  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and telephone number \_\_\_\_\_

1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☐ storage, ☐ disposal ☒ PBR  
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim  
c. ☒ Off-site ☐ treatment, ☒ storage, ☐ disposal  
d. ☒ Off-site ☐ use, ☐ reuse, ☒ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. ~670 kg./mo.  
b. ~8,000 kg./yr.

Facility generates but recycles perhaps  
750-1000 gal per year now (~250 kg/yr)

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>0001, 00039</u>	<u>Safety-kleen</u>	<u>77 Canal Rd., Fairless Hills, PA 19030</u>
<u>F006, 0001 F003 F005</u>	<u>Remtech Environmental</u>	<u>550 Industrial Dr., Lewisberry, PA 17335</u>
<u>F006, 0002, 6, 7, 8</u>	<u>Waste Conversion</u>	<u>2869 Sandstone Drive, Hatfield, PA 19440</u>
<u>0001, 0035, F003, F005</u>	<u>" "</u>	<u>" " " " " "</u>
<u>0001, F003, F005</u>	<u>Rinco Chemical Industries</u>	<u>1007 Vulcan Rd., Haskell Benton, AR 72015</u>

Waste  
Int'l  
solvents  
Inorganic  
acid &  
Filtercake

# Hazardous Waste Inspection Report Generators - Part B

1-No Violation Observed				2-Not Applicable	3-Not Determined	4-Non-Compliance
Status				REQUIREMENT		Chapter Citation
1	2	3	4			262
X				Hazardous waste determination, copies available	TCLP Generator knowledge.	.11
X				Identification number		.12(a)
		X		Hazardous waste shipments offered only to licensed transporters	Remed PA-AH0146 717-938-6745	.12(d)
X				Authorization received from TSD facility for wastes shipped off-site		.13
X				PA manifest used for intrastate shipments		.20(b)
X				Disposer state manifest or EPA format manifest used for out-of-state shipments		.20(c)
X				Manifests filled out properly and completely		.20(g)
X				Manifests routed properly and within time limits (7 days)		.23(e) or (f)
		X		Proper U.S. DOT shipping containers or packages		.30(1)
		X		Shipping containers marked and labeled according to U.S. DOT		.30(2)
X				Containers of 110 gal. or less marked with required PA label		.30(3)
		X		Placards offered to transporter		.33
		X		Wastes accumulated on-site for less than 90 days		.34(1)
X				Wastes stored in proper containers and properly marked and labeled		.34(2)
	See next page			Containers managed in accordance with	265.171-.177	.34(3)
		X		Containers clearly marked with accumulation date and visible for inspection		.34(4)
X				Records retained at designated location for 20 years		.40
X				Quarterly reports submitted to the Department		.41
		X		Exception reporting procedures followed		.42
		X		Hazardous waste disposal plan, if required		.45
		X		Spill reporting procedures followed		.46(a)
		X		Preparedness, Prevention and Contingency Plan and implemented		.46(e)
	X			Special requirements followed for international shipments		50.53.55.60
		X		On the job or classroom personnel training program	265.16	.34(a)(5)
		X		Drum accumulation area inspected weekly as per	265.174	.34(a)(3)

# HAZARDOUS WASTE INSPECTION REPORT TSD Facilities - Storage (Containers)

1—No Violation Observed				2—Not Assessable				3—Not Determined				4—Non-Compliance			
Status				REQUIREMENT								Chapter Citation			
1	2	3	4									264	265		
X				Containers managed to prevent leaks and spills. /Defective replaced with good containers								171	171	171(b)	17
X				Containers are compatible with waste stored.								172	172		
			X	Containers are closed during storage.								173(a)	17		
		X		Container storage area inspected weekly for leaks, deterioration, etc.								174	174		
X				Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.								176	176		
X				Satisfactory procedures followed for handling incompatible wastes.								177	177		
X				Incompatible wastes separated or protected from other materials.								177(c)	17		
			X	Containers accumulation areas have containment system capable of collecting and holding spills, leaks, and precipitation.								175(a)	17		
		X		Containment system has impervious base free of cracks.								175(a)	(1)	17	
X				Efficient drainage provided from base to sump or collection system.								175(a)	(2)	178	
X				Containment sufficient to contain volume of largest container or 10% of total volume of all containers, whichever is greater.								175(a)	(3)	178	
X				Run-on into containment system prevented.								175(b)		178(b)	
X				Spilled or leaked waste and accumulated precipitation removed from sump or collection system with sufficient frequency to prevent overflow.								175(c)		178(c)	
X				At closure, all hazardous wastes and hazardous waste residues removed. Remaining containers, liners, bases, and soil decontaminated or removed.								178		178(d)	
X				Indoor accumulation of reactive or ignitable waste with less than 20% solids meets height and configuration criteria ( $\leq 6$ feet high, 8 ft x 8 ft, 5-foot surrounding aisle space).								179(1)		178(e)	
X				Outdoor accumulation of reactive waste with less than 20% solids meets height and configuration criteria ( $\leq 9$ feet high, 16 ft x 16 ft, 5-foot aisle surrounding group, 12 ft access way).								179(2)		178(e)	
X				Minimum setback of 40 feet maintained for outdoor container accumulation of ignitable or reactive wastes.								179(2)		178(e)	
X				Accumulation of nonreactive or nonignitable hazardous waste meets height and configuration criteria ( $\leq 9$ feet high).								179(3)		178(e)	
X				Containers labeled to accurately identify hazardous waste contained.								Act 97 Section 6018.403(b)(2)			

# Hazardous Waste Inspection Report Land Disposal Restriction Supplemental Checklist

1-No Violation Observed				2-Not Applicable				3-Not Determined				4-Non-Compliance					
Status				REQUIREMENT												Citation 40 CFR Part 268	
1	2	3	4														
X				<b>Generators</b>													
		X		Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)	
			X	Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)	
X				Dilution not used as a substitute for treatment.												3	
X				Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.												7(a)(5), (a)(6)	
	X			<b>Storage Facilities</b>													
				Facility verifies generators classification of waste in accordance with waste analysis plan.												25 Pa Code 265.13(c)	
				Containers marked to identify contents and accumulation date.												50(a)(2)	
				Notification sent with shipments of wastes that do not meet treatment standards.												7(a)(1)	
				Notification and certification sent with shipments of wastes meeting treatment standards.												7(a)(2)	
				Facility maintains records of documents produced pursuant to LDR requirements.												7(a)(6)	
				<b>Treatment Facilities, including PBR and RRR Facilities</b>													
				Dilution not used as a substitute for treatment.												3	
				Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.												7(b)	
				Certification and/or notification sent with shipments of waste.												7(b)(4), (b)(5), (b)(6)	
				<b>Land Disposal Facilities</b>													
				Facility tests wastes received to assure compliance with applicable treatment standards.												7(c)(2)	
				Facility land disposes of restricted waste only if it meets applicable treatment standard.												40	
	V			Facility retains copies of generator notifications and certifications.												7(c)(1)	

Date of Inspection

11/9/92

Identification Number

PAO 981 103 617

Facility Site Name

CMS Gilbreth

~~PER~~ PERMISSION TO CONDUCT INSPECTION GRANTED BY MR. JAMES JORDAN.

THIS FACILITY MANUFACTURES PLASTIC FILM USED FOR PACKAGING. GENERAL TYPES HAZ. WASTE PRODUCED INCLUDE: CHROMIC ACIDS, FLAMMABLE INK WASTES, FILTERCAKE, PARTS WASHER WASTE, AN ELECTROPLATING LIQUIDS.

VIOLATIONS OBSERVED TODAY ARE AS FOLLOWS:

262.42 EXCEPTION REPORTING. FACILITY IS REQUIRED TO FILE AN EXCEPTION REPORT WITH PADER WITHIN 7 DAYS ESTIMATED ARRIVAL AT TSD.

"REMTECH" MANIFEST #'S: PAC5886506 10/09/92 + PAC5885121 7/24/92 - FACILITY HAS AN  
SAFETY-KLEEN " " PAC7028803 7/20/92 + PAC6632452 5/28/92 - RETURN/TSD SIGN  
CORRECT WITHIN 14 DAYS. MANIFESTS FOR

262.34(4) ONE CONTAINER MARKED FLAMMABLE WASTE INK IN OUTSIDE STORAGE AREA HAS NO ACCUMULATION DATE. CORRECT IMMEDIATELY.

262.34(1) ONE 55-GAL BLUE PLASTIC DRUM MARKED "CHROMIC ACID/COPPER SULFATE D002, 6, 7, 8" STORED INSIDE FACILITY NEAR PBR UNIT HAS A 4/20/92 ACCUMULATION DATE. FACILITY SHOULD PROPERLY DISPOSE OF THIS CONTAINER BY 12/7/92.

(FOOG)  
262.34(4) THERE IS ONE 55-GAL DRUM WITH SOME FILTER CAKE WASTE IN IT. THIS CONTAINER IS NOT LABELED NOR DATED. SHOULD BE LABELED & DATED WHEN WASTE IS FIRST PUT IN.

265.173(0) A 55-GAL DRUM FULL OF FOOG STORED OUTSIDE PBR CAGED AREA DID NOT HAVE A LID. CORRECT IMMEDIATELY. THIS DRUM SHOULD ALSO BE PLACED IN A BERMED AREA AS PER 265.178.

HAVE BEEN  
LANDBANS ~~ARE~~ NOT ~~BEING~~ ATTACHED TO THE TWO "REMTECH" MANIFESTS REFERENCED ABOVE.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of the Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Date

11/9/92

Inspector (signature)

Date

11/9/92

Page 5 of 6



THE FACILITY HAS FIRST SOURCE INC. COME IN TO RECLAIM THE  
FACILITY'S WASTE INK SOLVENTS. THE FACILITY REUSES THE RECLAIMED  
MATERIAL & MANIFESTS THE SLUDGE AS HAZARDOUS.

RPC PLAN NOT REVIEWED TODAY.

Notes: 1/14/92: I sent facility copy of ROR report today & asked them to file it w/ H-burg.

JAN 22 1993

# 268



CMS Gilbreth  
Packaging Systems

3300 State Road • P. O. Box 779 • Bensalem, PA 19020 • 215-638-7100 • FAX 215-638-7105

fill  
code  
7/3/89

CMS Gilbreth  
GEN

June 27, 1989

US EPA Region III  
Waste Management Branch  
841 Chestnut St.  
Philadelphia PA 19107

Dear Sir/Madam:


I would like to request that the zip code for our Bristol plant  
(~~19007~~) be changed from 19007 to 19020.

The incorrect zip code only delays mail from your office as well  
as from our hauler and disposer.

The original permit request said 19007 was the zip code but  
correspondence on 6/6/88, 9/30/88 and 7/23/87 all refer to the  
zip 19020.

Thank you very much for helping us to let the paper work flow  
more evenly.

Sincerely,

  
Donald J. Maltz  
Operations Mgr.

Culbro Machine Systems • Gilbreth • Trine

A company of the Culbro Corporation 

RECEIVED  
PA SECTION

JUN 28 1973

EPA, R3



## Notification of Hazardous Waste Activity

Please refer to the *Instructions Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

[illegible]

## X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

[illegible]

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

[illegible]

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 4. Toxic  
(DOOO)

## XI. Certification

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

**Signature**

Signature Donald J. Maltz

Name and Official Title (type or print)

DONALD J. MALTZ, OPERATIONS  
MANAGER

Date Signed \_\_\_\_\_

8/15/88

I. Installation's EPA I.D. Number

P	A	D	9	8	1	1	0	3	6	1	7
---	---	---	---	---	---	---	---	---	---	---	---

II. Name of Installation Gilbreth International Corp.

### III. Location of Installation

Bristol Township

Municipality (Township, Borough, City)

Bucks

County

**IV. IRS Employer Identification Number**

2	3
---	---

 $-$ 

1	6	0	4	4	9	7
---	---	---	---	---	---	---

V. SIC Codes (four-digit number in order of priority)

3	0	7	9
---	---	---	---

Specify: Gen'l Pkg. Converter

3	4	7	1
---	---	---	---

Specify: Plating

2	7	5	4
---	---	---	---

Specify: Printing

--	--	--	--

Specify:

## VI. Type of Hazardous Waste Activity

- ☒ 1. Treater  
☒ 2. Storer  
☐ 3. Disposer  
☐ 4. Reuse, Recycle, Reclaim  
☒ 5. Permit by Rule - See Attached

## VII. Existing Environmental Permits

#### A. NPDES (Discharges to Surface Water)

[illegible]

**B. UIC (Underground injection of fluids)**

[illegible]

### C. RCRA (Hazardous Waste)

[illegible]

#### D. PSD (Air Emissions from Proposed Sources)

[illegible]

**E. Municipal Waste (As defined in Act 97)**

[illegible]

**F. Residual Waste (As defined in Act 97)**

[illegible]

### G. Permit by Rule

Name of POTW Bristol Township

POTW NPDES Number

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	-----

H. Other

[illegible]

Supplement - Section IX

- 1) The legal boundaries of the facility
  - a) Enclosed is an additional map showing the property lines of the entire block including the area that subdivides the plot with "Coyne Chemical Company". (Marked as Supplement A)
  - b) This map also shows the only two areas where waste is treated and stored.
- 2) There are no existing or proposed intake or discharge structures. After the waste water is treated and tested to be below the township levels, it is discharged into the existing domestic sewer system.
  - a) A copy describing the process is also attached. (Marked as Supplement B)
  - b) A copy of a letter to the township showing the test results and the actual "dump time" is also attached. (Marked as Supplement C)
- 3) All hazardous waste management facilities are noted in 1-b above.
- 4) Gilbreth does not inject fluids of any kind into any wells, springs, or surface water.
  - a) No intake or discharge, other than listed above, is done on any property either owned by Gilbreth or not at any location.

SUBJECT: RCRA Inspection - *Gilbreth International Inc. - Croydon, Pa.* DATE: *7/11/88*  
*PAD 981103617*

FROM: *JK* Gregory A. Koltonuk, ~~████████████████████~~  
RCRA Enforcement Section (3HW)

TO: File

Thru: *mp 7/11/88*  
*VICKY BINETTI, CHIEF - RCRA Enforcement Section, 3HW15*

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF THESE  
VIOLATIONS.



# Hazardous Waste Inspection Report Generators - Part A

Date of inspection 5/17/88 Time start 10<sup>00</sup> Time finish 1145  
 Name of inspector ROBERT ZANG  
 Company, installation name GILBRETH, INTERNATIONAL, INC.  
 Location 3001 STATE ROAD  
 County BUCKS Municipality BRISTOL TWP.  
 Identification number PAD 981103617  
 Name of responsible official PETER HOLLISH  
 Title MFG. MANAGER  
 Mailing address 3001 STATE RD., CROYDON, PA - 19020  
 Area code and telephone number 215-638-7100  
 Name of person interviewed SAME  
 Title "  
 Mailing address (if different from above) "  
 Area code and telephone number "

## 1. Current waste handling method:

- |    |  |  |  |  |                                  |
|----|--|--|--|--|----------------------------------|
| a. | <input type="checkbox"/> On-site             | <input type="checkbox"/> treatment,            | <input type="checkbox"/> storage,            | <input type="checkbox"/> disposal            | <input type="checkbox"/> PBR     |
| b. | <input type="checkbox"/> On-site             | <input type="checkbox"/> use,                  | <input type="checkbox"/> reuse,              | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |
| c. | <input checked="" type="checkbox"/> Off-site | <input checked="" type="checkbox"/> treatment, | <input checked="" type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal |                                  |
| d. | <input type="checkbox"/> Off-site            | <input type="checkbox"/> use,                  | <input type="checkbox"/> reuse,              | <input type="checkbox"/> recycle,            | <input type="checkbox"/> reclaim |

## 2. Amount of hazardous waste produced:

- a. <1,000 kg./mo. } MAKE LARGE QUANTITIES  
 b. <12,000 kg./yr. } SHIPMENTS

## 3. Types of hazardous waste produced by Hazardous Waste Number:

D001-2  
ELECTROPLATING WASTES

## 4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☒ No

**1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not Determined**

Compliance Status				REQUIREMENT	Chapter Citation
1	2	3	4		75.262
	✓			Identification number	(c)(1)
			✓	Hazardous waste shipments offered only to licensed transporters	(c)(4)
			✓	Authorization received from TSD facility for wastes shipped off-site	(d)
			✓	PA manifest used for intrastate shipments <i>NO MANIFESTS ON-SITE</i>	(e)(2)
			✓	Disposer state manifest or EPA format manifest used for out-of-state shipments "	(e)(3)
			✓	Manifests filled out properly and completely "	(e)(7)
			✓	Manifests routed properly and within time limits (7 days) "	(e)(14) or (15)
			✓	Proper U.S. DOT shipping containers or packages	(f)(1)(i)
			✓	Shipping containers marked and labeled according to U.S. DOT	(f)(1)(ii)
	✓			Containers of 110 gal. or less marked with required PA label	(f)(1)(iii)
			✓	Placards offered to transporter	(f)(2)
			✓	Wastes accumulated on-site for less than 90 days	(g)(1)(i)
			✓	Wastes stored in proper containers and properly marked and labeled	(g)(1)(ii)
			✓	Containers managed in accordance with 75.265(q)(1)-(9) <i>NO INSPECTION LOG ON-SITE</i>	(g)(1)(iii)
✓				Containers clearly marked with accumulation date and visible for inspection	(g)(1)(iv)
✓				Records retained at designated location for 20 years	(h)
			✓	Quarterly reports submitted to the Department <i>REPORTS NOT ON-SITE</i>	(i)
			✓	Exception reporting procedures followed	(j)
			✓	Hazardous waste disposal plan, if required	(l)
			✓	Spill reporting procedures followed	(m)(1)
✓				Preparedness, Prevention and Contingency Plan and implemented <i>PLAN NOT DEVELOPED PER GUIDELINES</i>	(m)(5)
			✓	Special requirements followed for international shipments	(o)
			✓	On the job or classroom personnel training program [75.265(f)]	(g)(1)(6)
✓				Drum accumulation area inspected & inspection logged weekly as per 75.265(q)(5)	(g)(1)(iii)

Hazardous Waste Inspection Report  
Comments - Part C

Date of Inspection 5/17/88 Identification Number PAD 981103617  
Company, Installation Name GILBRETH INTERNATIONAL, INC  
County BUCKS Municipality BRISTOL TWP.  
Mr. Hollish granted the Department permission to conduct this partial inspection.

Non-Compliance Items:

- 1) Containers were not all closed (one had a funnel in the bung hole, and one had not been secured with a clamp).
- 2) Containers were not all properly labeled to accurately ~~identify~~ identify their contents, and accumulation dates affixed to the containers. <sup>Inspector</sup> not logged.
- 3) Manifests, quarterly reports and drum storage area inspection log entries are not being kept on-site, but transferred to Gilbreth's other facility located at 3300 State Road. The orig. documents should be kept on-site.
- 4) PPC Plan should be revised according to the Department's Guidelines document. It should address all of the elements listed in that document.

\* Note = The facility should submit information to the Department to determine if it has obtained status as a Permit-by-Rule facility.

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature)

John Hollish

Date

5/17/88

Inspector (signature)

Robert Zong

Date

5/17/88



# Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## For Official Use Only

Comments									
C									
C									
Installation's EPA ID Number					Approved	Date Received (yr. mo. day)			
C					T/A C				
F					1				

## I. Name of Installation

**CLIPPER INTERNATIONAL CORP**

## II. Installation Mailing Address

Street or P.O. Box										
C	3	3	0	0	S	T	A	T	E	
3					R	O	A	D		
City or Town								State	ZIP Code	
C	B	E	N	S	A	L	E	M	P	A
4									1	9
									0	2
										0

## III. Location of Installation

Street or Route Number									
C	3	0	0	1	S	T	A	T	E
5					R	O	A	D	
City or Town								State	ZIP Code
C	B	R	I	S	T	O	L	P	A
6								1	9
								0	0
									7

## IV. Installation Contact

Name and Title (last, first, and job title)								Phone Number (area code and number)			
C	H	O	L	L	I	S	H	2	1	5	7
2								8	5	3	3
								5	0		

## V. Ownership

A. Name of Installation's Legal Owner								B. Type of Ownership (enter code)			
C	G	I	L	B	R	E	T				
R											

## VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1a. Generator	<input type="checkbox"/> 1b. Less than 1,000 kg/mo.	<input type="checkbox"/> 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)	
<input type="checkbox"/> 2. Transporter		<input type="checkbox"/> a. Generator Marketing to Burner	
<input checked="" type="checkbox"/> 3. Treater/Storer/Disposer		<input type="checkbox"/> b. Other Marketer	
<input type="checkbox"/> 4. Underground Injection		<input type="checkbox"/> c. Burner	
<input type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)		<input type="checkbox"/> 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification	
<input type="checkbox"/> a. Generator Marketing to Burner			
<input type="checkbox"/> b. Other Marketer			
<input type="checkbox"/> c. Burner			

## VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

<input type="checkbox"/> A. Utility Boiler	<input type="checkbox"/> B. Industrial Boiler	<input type="checkbox"/> C. Industrial Furnace
--	---	--

## VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

<input type="checkbox"/> A. Air	<input type="checkbox"/> B. Rail	<input type="checkbox"/> C. Highway	<input type="checkbox"/> D. Water	<input type="checkbox"/> E. Other (specify)
---------------------------------	----------------------------------	-------------------------------------	-----------------------------------	---

## IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

<input type="checkbox"/> A. First Notification	<input checked="" type="checkbox"/> B. Subsequent Notification (complete item C)
EPA ID Number: <b>PA 100 111 103 16 117</b>	





GILBRETH INTERNATIONAL CORPORATION

3300 STATE ROAD

P.O. BOX 779

BENSALEM, PA 19020

PHONE: 215-638-7100 — TELEX: 4761024 — FAX: 215-638-7105

June 6, 1988

U.S. EPA Region III  
Waste Management Branch  
MS 3HW34  
841 Chestnut St.  
Phila. PA 19107

Dear Sir or Madam:

I have enclosed a subsequent notification of "Hazardous Waste Activity" to include the electroplating of gravure printing cylinders. To support our printing operation, we have added a plating operation.


Our waste consists of any spoiled or spent chemical used in our plating that we dispose of off site. In addition, we have set up a waste water treatment system which is capable of handling the approximate 250 gallons of waste water we expect per day.

The waste water will be pre-treated before we dispose of it in the township sewer system. We have been working with the township to ensure that the water we dump meets the standards of clean water set up by the township and the State.

We have also changed responsibility of the site to the manufacturing manager at the site.

If you have any questions, please do not hesitate to call me.

Sincerely,

  
Donald J. Maltz  
Operations MGr.

*Permit - By Rule*





U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

USE PREVIOUS EDITIONS OF THIS FORM ONLY IN THE UNHAZARDOUS AREAS ONLY. USA 100, 0240-EPA-01 Expiration Date 12

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

RECEIVED  
PA SECTION

JUL 28 1987

PLEASE PLACE LABEL IN THIS SPACE  
EPA, R3

INSTRUCTIONS: If you received a pre label, affix it in the space at left. If any information on the label is incorrect, draw through it and supply the correct information in the appropriate section below. If the complete and correct, leave items I, II, below blank. If you did not receive a pre label, complete all items. "Installation" is a single site where hazardous waste is generated, stored and/or disposed of, or a port of principal place of business. Please to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. Information requested herein is required (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

GILBRETH INTERNATIONAL CORPORATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3300 STATE ROAD

CITY OR TOWN

BENSALEM

ST.

ZIP CODE

PA 19020

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

3001 STATE ROAD

CITY OR TOWN

BRISTOL

ST.

ZIP CODE

PA 19007

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

MALTZ DONALD OPERATIONS MGR

215-638-7100

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

GILBRETH INTERNATIONAL CORPORATION

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F - FEDERAL  
M - NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION

☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 24	13 - 20	23 - 24	23 - 24	22 - 24	23 - 24
7	8	9	10	11	12
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
D 0 0 7					
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
19	20	21	22	23	24
D 0 0 2					
25 - 26	25 - 26	25 - 26	25 - 26	25 - 26	25 - 26
25	26	27	28	29	30
31 - 32	31 - 32	31 - 32	31 - 32	31 - 32	31 - 32

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 24	23 - 24	23 - 24	23 - 24	23 - 24	23 - 24
37	38	39	40	41	42
25 - 26	25 - 26	25 - 26	25 - 26	25 - 26	25 - 26
43	44	45	46	47	48
27 - 28	27 - 28	27 - 28	27 - 28	27 - 28	27 - 28

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.


40				50				51				52				53				54			
40	41	42	43	50	51	52	53	51	52	53	54	52	53	54	55	53	54	55	56	54	55	56	57

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 4. TOXIC  
[D000]

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Donald J. Maltz, Operations Mgr.	DATE SIGNED 7/23/87
--	---	------------------------

NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
Donald J. Maltz, Operations Mgr.	7/23/87

DATE SIGNED  
7/23/87

Donald J. Maltz, Operations Mgr.

7/23/87

EPA Form 8700-12 (6-85) REVERSE

RECEIVED  
PA SECTION

JUL 28 1987

EPA, B3

Wastes Collected  
7/31/87 CG





# GILBRETH INTERNATIONAL CORPORATION

3300 STATE ROAD P.O. BOX 779 BENSLEM, PA 19020

PHONE: 215-638-7100 — TELEX: 4761024 — FAX: 215-638-7105

July 23, 1987

RECEIVED  
PA SECTION

JUL 28 1987

EPA, R3

U.S. EPA Region III  
Waste Management Branch  
MS 3HW34  
841 Chestnut Street  
Philadelphia PA 19107

Gentlemen:

Enclosed you will find our application for additional hazardous waste we will be generating. We currently have a permit for the temporary storage of our flammable waste generated from our printing operation. We are just now completing a chrome plating line to support our printing operation. This plating line is designed to plate our gravure printing cylinders. From this new operation, we expect to generate only two to three 55 gallon drums per year of the following waste:

- a) Chromic acid
- b) Chrome sludge (from our stripping)
- c) Ferric chloride

There is no cyanide used in our plating operation. There will be, however, a small amount of copper, nickel and chromium deposited in the waste from the operation. The reason for the accumulation of this waste is due to the fact that we have to occasionally dump our tanks because of "plating contaminants".

We are also investigating the possible treatment of any waste water that we may get from this process. We are currently sending out for analysis, all of the chemicals that we have been able to collect. We do not expect a problem with this in so much as our quantities will be so small.

I called the regional office and I was told that we would be allowed to use the same EPA identification number for this new waste. In either case, I would appreciate it if you would send me some verification of the new waste stream and the I.D.# we should use for it.

Sincerely,

Donald J. Maltz  
Operations Mgr.

*Coded  
7-31-87*

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861.

2. The second part is a report from the Secretary of the Treasury, dated January 1, 1861.

3. The third part is a report from the Secretary of the Interior, dated January 1, 1861.

4. The fourth part is a report from the Secretary of the Navy, dated January 1, 1861.

5. The fifth part is a report from the Secretary of the War, dated January 1, 1861.

6. The sixth part is a report from the Secretary of the State, dated January 1, 1861.

7. The seventh part is a report from the Secretary of the Army, dated January 1, 1861.

8. The eighth part is a report from the Secretary of the Navy, dated January 1, 1861.

9. The ninth part is a report from the Secretary of the War, dated January 1, 1861.

# ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

**INSTRUCTIONS:** If you received a label, affix it in the space at left. If information on the label is incomplete, through it and supply the correct information in the appropriate section below. If complete and correct, leave blank. If you did not receive a label, complete all items. \*Regardless of whether hazardous waste is treated, stored and/or disposed of, please provide the name of the person's principal place of business to the INSTRUCTIONS FOR FILM CATION before completing the information requested herein in regard to the 3010 of the Resource Conservation Act.

INSTALLATION'S EPA I.D. NO.  
I. NAME OF INSTALLATION  
II. INSTALLATION MAILING ADDRESS  
III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

## FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER  
APPROVED  
DATE RECEIVED

## I. NAME OF INSTALLATION

GILBRETH INT'L CORP

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3300 STATE RD

CITY OR TOWN

PHILADELPHIA

ST. ZIP CODE

PA 19020

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

3001 STATE RD

CITY OR TOWN

BRISTOL

ST. ZIP CODE

PA 19007

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & initials)

PHONE NO. (area code & no.)

MALTZ DONALD OPERATIONS MGR

215-638-710

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

GILBRETH INTERNATIONAL CORPORATION

F. TYPE OF INSTALLATION

F - FEDERAL  
M - NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (through air)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify)

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NUMBER

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

**IX. DESCRIPTION OF HAZARDOUS WASTES** (continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. LISTED INFECTIOUS WASTES.** Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospital, university hospital, medical and research laboratories your installation handles. Use additional sheets if necessary.

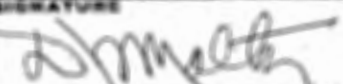
49	50	51	52	53	54
----	----	----	----	----	----

**E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ F. FLAMMABLE (DHSF)     
 ☐ G. CORROSIVE (DHSF)     
 ☐ H. REACTIVE (DHSF)     
 ☐ I. TOXIC (DHSF)

**X. CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) Donald J. Waltz, Operations Mgr.	DATE SIGNED 10/28/85
---	---	-------------------------



# GILBRETH INTERNATIONAL CORPORATION

3300 STATE ROAD

P.O. BOX 779

BENSALEM PA 19020

PHONE: 215-638-7100

TWX: 510/667/1503

October 28, 1985

U.S. EPA Region III  
Waste Management Branch  
MS 3HW 34  
841 Chestnut St.  
Phila. PA 19107

Gentlemen:

I have enclosed our application for an additional E.P.A. I.D. No. We are going to be starting up a new printing press in our Bristol PA plant some time in the middle of December.

We have been operating a similar printing press at our Bensalem PA plant for a number of years and the waste solvents from this new press will be identical to our old press.

Very truly yours,

Donald J. Maltz  
Operations Manager

RECEIVED  
RCRA REPORT SECTION

OCT 29 1985

U.S. EPA, Region III



# GILBRETH INTERNATIONAL CORPORATION

3300 STATE ROAD

P.O. BOX 779

BENSALEM PA 19020

PHONE: 215-638-7100

TWX: 510/667/1503

October 28, 1985

U.S. EPA Region III  
Waste Management Branch  
MS 3HW 34  
841 Chestnut St.  
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We have been operating a similar printing press at our Bensalem PA plant for a number of years and the waste solvents from this new press will be identical to our old press.

Very truly yours,

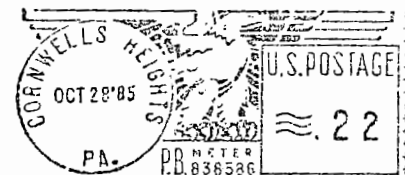
Donald J. Maltz  
Operations Manager

RECEIVED  
RCRA SUPPORT SECTION

OCT 29 1985

U.S. EPA, Region III

**GILBRETH** INTERNATIONAL  
CORPORATION  
3300 STATE ROAD  
P.O. BOX 779  
BENSALEM, PA. 19020-0779



U.S. EPA Region III  
Waste Management Branch  
MS 3HW 34  
841 Chestnut St.  
Philadelphia PA 19107

